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February 5, 2024

VIA ECF

The Honorable Andrew L. Carter, Jr., U.S.D.J.
United States District Judge
United States District Court for the Southern District of New York
Thurgood Marshall United States Courthouse
40 Foley Square
New York, New York 10007

**Re: *United States of America v. Valeria Ruth HaCohen*,
Case No. 1:20-cr-00648-ALC**

Dear Judge Carter:

We represent the defendant, Valeria Ruth HaCohen, in the above-referenced matter. We write to request a modification of the conditions of Ms. HaCohen's bail to permit her to travel to California the week of February 15 through February 26, 2024.

Under the conditions of Ms. HaCohen's bail, she is required to seek leave of the Court to travel outside of New York or New Jersey. The purpose of the requested travel is for Ms. HaCohen to have a series of meetings with her longstanding client, KLA-Tencor, at its offices in Milpitas, California. If approved, Ms. HaCohen would provide a complete travel itinerary and any other details as might be necessary to the Office of Pretrial Services and the U.S. Attorney's Office.

Ms. HaCohen has made previous applications to this Court to travel for surgery (Dkt. No. 68); her son's Bar Mitzvah (Dkt. No. 80); a family holiday (Dkt. No. 87); and to accompany her children on a visit with their father (Dkt. No. 100). The Office of Pretrial Services and the U.S. Attorney's Office have not objected to any of these travel requests, and each request was granted by the Court. Following each trip, Ms. HaCohen has returned home to New Jersey and has continued to participate in this action, demonstrating that she is not a flight risk and does not present a risk to her community or the public at large.

The U.S. Attorney's Office and the Office of Pretrial Services have indicated that they do not object to this request.

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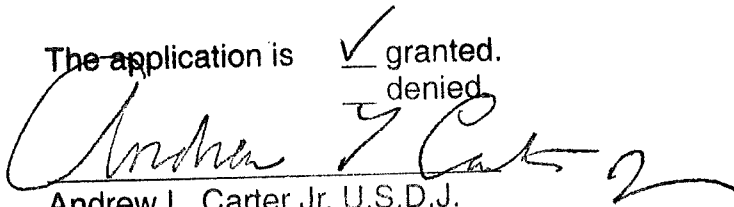
We are most grateful for the Court's consideration of this request and are available to answer any questions or discuss this matter with the Court in further detail.

Respectfully submitted,

/s/ Ernest Edward Badway
Ernest Edward Badway

cc: Michael D. Lockard, Esq. (via ECF)
Matthew J.C. Hellman, Esq. (via ECF)
Nicholas Bradley, Esq. (via ECF)
Ms. Courtney M. DeFeo (via e-mail-- Courtney_DeFeo@nyspt.uscourts.gov)

The application is ☒ granted.
☐ denied.


Andrew L. Carter Jr, U.S.D.J.
Dated: February 14, 2024
NY, New York